

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

KEITH ROSE,)
)
Plaintiff,)
)
v.) Cause No. 4:18-cv-01568 (RLW)
)
CITY OF SAINT LOUIS, MISSOURI, et al.)
)
Defendants.)

**CONSENT MOTION TO EXTEND THE DEADLINE FOR PLAINTIFF'S RESPONSE
TO DEFENDANTS' MOTION FOR JUDGMENT ON THE PLEADINGS**

With consent of Defendants, Plaintiff moves this Court to extend the deadlines for Plaintiff's memorandum in opposition to Defendants' Motion for Judgment on the Pleadings.

1. On March 19, 2020, certain Defendants filed a Motion for Judgment on the Pleadings (Doc. No. 66). These same Defendants also filed a Notice that a Motion to Consolidate for the purposes of ruling on the Motion for Judgment on the Pleadings was filed in a related case, *Nelson v. City of St. Louis*, 4:18-cv-1561. (Doc. No. 67).

2. Pursuant to Local Rule 7 - 4.01, Plaintiff's opposition memorandum is due on April 2, 2020.

3. Due to the unusual legal issues presented in the Motion and the disruption of normal business due to the COVID-19 pandemic, Plaintiff requires more time to respond to the Motion.

4. Plaintiff respectfully requests to extend the deadline to file an opposition memorandum to April 16, 2020.

5. Defendants have been apprised of this request and consent to this extension of the deadline.

6. No party will be prejudiced by the extension of this deadline. The requested relief

will not require any modification of any other orders from this Court.

WHEREFORE, for the reasons stated above, Plaintiff, with the agreement and consent of Defendants, requests this honorable Court extend the deadline for Plaintiff's response to the above Motion to April 16, 2020.

Date: April 1, 2020

Respectfully Submitted,

ARCH CITY DEFENDERS

By: /s/ Maureen Hanlon

Blake A. Strode, #68422(MO)
Michael-John Voss, #61742(MO)
Maureen G. V. Hanlon, #70990(MO)
John M. Waldron, #70401(MO)
440 N. Fourth Street, Suite 390
Saint Louis, MO 63102
855-724-2489 ext. 1012
bstrode@archcitydefenders.org
mjvoss@archcitydefenders.org
mhanlon@archcitydefenders.org
jwaldron@archcitydefenders.org

KHAZAEI WYRSCH, LLC

Javad M. Khazaeli, #53735(MO)
James R. Wyrsch, #53197(MO)
Kiara N. Drake, #67129(MO)
911 Washington Avenue, Suite 211
St. Louis, MO 63101
(314) 288-0777
javad.khazaeli@kwlawstl.com
james.wyrsch@kwlawstl.com
kiara.drake@kwlawstl.com

Attorneys for Plaintiff